

EXHIBIT D

2964 Peachtree Road
Suite 555
Atlanta, GA 30305-2153

SEC v CryptoFX
John Lewis, Receiver

For the Period from 1/1/2023 to 3/31/2023

April 28, 2023

Professional Services

	Hours	Amount
Accounting	7.40	2,042.40
Asset Analysis & Recovery	58.50	15,355.20
Asset Disposition	2.40	722.60
Business Analysis	88.10	17,218.40
Business Operations	1.50	482.80
Case Administration	42.80	14,093.00
Claims Administration & Objections	1.10	398.20
Data Analysis	59.30	16,071.40
Employee Benefits / Pensions	5.70	1,232.60
Fee / Employment Applications & Objection	14.10	NO CHARGE
Forensic Accounting	34.40	10,403.80
Litigation Consulting	60.60	19,993.60
Status Reports	9.50	3,249.80
Tax Issues	5.60	1,545.60
For professional services rendered	391.00	\$102,809.40

Additional Charges :

Online & Other Research/Reports	258.75
Tax Return Filing Fees	70.00
Total costs	\$328.75

Total amount of this bill	\$103,138.15
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John Lewis, Receiver

For the Period from 1/1/2023 to 3/31/2023

April 28, 2023

Professional Services

	Hrs/Rate	Amount
Dwaine A. Butler	106.50 169.04/hr	18,003.00
James R. Jennings, CPA	1.60 276.00/hr	441.60
S. Gregory Hays, CTP, CIRA	127.40 330.74/hr	42,136.80
Scott S. Askue	155.50 271.56/hr	42,228.00
For professional services rendered	391.00	\$102,809.40

Additional Charges :

Online & Other Research/Reports	258.75
Tax Return Filing Fees	70.00
Total costs	\$328.75

Total amount of this bill	\$103,138.15
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John Lewis, Receiver**For the Period from 1/1/2023 to 3/31/2023**

April 28, 2023

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
<u>Accounting</u>				
1/11/2023	SSA	Drafted email to banking representative regarding account ledger.	0.20 276.00/hr	55.20
1/12/2023	SSA	Reviewed report of receivership transactions. Drafted email to the Receiver regarding transfer of funds between accounts.	0.40 276.00/hr	110.40
	SSA	Prepared updated analysis of receiver assets and recoveries through December 2022.	1.30 276.00/hr	358.80
	SSA	Set up and prepared SFAR though December 2022.	2.30 276.00/hr	634.80
1/19/2023	SSA	Reviewed response to email from the Receiver regarding sources and uses of investor funds.	0.40 276.00/hr	110.40
1/30/2023	SSA	Verified monthly allowance payment to Defendant Benvenuto. Drafted email to the Receiver regarding same.	0.20 276.00/hr	55.20
3/2/2023	SSA	Reviewed Angelica Vargas' bank records for sources of funds. Reviewed budget prepared by Mauricio Chavez. Drafted email to Sonila Themeli regarding issues for hearing.	1.10 276.00/hr	303.60
	SSA	Drafted email to Paul Flack regarding wire instructions for return of retainer. Drafted email to Sonila Themeli regarding source of funds.	0.30 276.00/hr	82.80
3/24/2023	SSA	Prepared fee payment allocation among defendant accounts. Drafted emails to and reviewed emails from bank representative and Receiver regarding wire transfers.	0.60 276.00/hr	165.60
3/28/2023	SSA	Prepared template for payment of professional fees from each Defendant account.	0.30 276.00/hr	82.80
3/29/2023	SSA	Prepared updated wire instructions for Receiver's new bank account. Drafted email to closing attorney for Hogan Lane property.	0.30 276.00/hr	82.80
Subtotal			7.40	2,042.40
<u>Asset Analysis & Recovery</u>				
1/3/2023	SSA	Reviewed appraisal of Waller County property and reviewed purchase documents for same. Drafted email on discrepancy.	1.20 276.00/hr	331.20
1/13/2023	SSA	Reviewed value of holdings at Exodus and updated recovery analysis with same.	0.20 276.00/hr	55.20
1/17/2023	SSA	Researched for information relating to Ebenezer Construction and involvement in Waller County properties.	2.30 276.00/hr	634.80

			<u>Hrs/Rate</u>	<u>Amount</u>
1/20/2023	SSA	Reviewed documents produced by Angelina Vargas and researched for purchase of vehicles.	0.60 276.00/hr	165.60
1/23/2023	SGH	Research regarding the seller of the real property in Waller County for \$2.0 million to CBT Group when current value is \$1.0. Drafted several emails regarding same. Reviewed reports and sale contract and legal description. Research regarding prior owner Odis Styers. Drafted email regarding additional research to Sonila Themeli and Dwaine Butler	1.50 362.00/hr	543.00
	DAB	Discussed issues with Greg Hays regarding sale of property by Odis Styles III. Researched idicore for agent information. Reviewed and responded to emails from Mr. Hays regarding same. Reviewed county property records for the property and ownership information. Verified ownership of properties.	0.80 170.00/hr	136.00
	SSA	Reviewed for information relating to Waller County real property purchases.	0.10 276.00/hr	27.60
1/27/2023	SGH	Reviewed information regarding Santander and the car loans. Email to Sonila Themeli regarding same.	0.40 362.00/hr	144.80
2/1/2023	SGH	Reviewed documents produced by PLS Financial Services. Researched information and lawsuits against PLS. Reviewed financial information and daily volume of money order purchased in 2021. On some days over \$60K was purchased in Money Order. Drafted email to the Receiver and Sonila Themeli regarding potential issues with PLS and possible claims. Drafted email to James Daniels regarding money order issue.	3.00 362.00/hr	1,086.00
	SSA	Reviewed insurance policy and other issues relating to vehicles. Researched for purchase documents. Prepared analysis of same.	1.60 276.00/hr	441.60
	SSA	Researched for invoices, payments and relating real property issues relating to payments to Ebenezer Construction. Drafted emails to Kierra Powell regarding same.	1.20 276.00/hr	331.20
2/2/2023	SGH	Research in Relativity regarding PLS, Barri and Western Union Money Order. Drafted email to Receiver Team regarding issue and procedures in money order and the issues on check where Payee is not name. There are almost \$1 million in Money Orders with no Payee.	2.00 362.00/hr	724.00
	SGH	Reviewed regarding money order and remittance transfers. Drafted email to Receiver Team regarding same.	0.80 362.00/hr	289.60
	SSA	Reviewed data provided by PLS and formatted for analysis. Prepared summary of transactions.	2.20 276.00/hr	607.20
	DAB	Researched Relativity for money order and transaction detail. Reviewed WhatsApp messages for references to money orders and cashier's check. Continued to review money order receipt detail for transaction information.	1.60 170.00/hr	272.00
2/3/2023	SGH	Additional research regarding Money Orders, PLS, and the replacement vendor after October 2021 when CFX discontinued issuing Money Orders.	0.70 362.00/hr	253.40
	DAB	Reviewed emails from the Receiver and Greg Hays regarding potential claim against PLS. Continued research of money order transactions in Relativity. Discussed issues with Mr. Hays regarding WhatsApp communications regarding money orders.	2.20 170.00/hr	374.00

			Hrs/Rate	Amount
2/6/2023	SSA	Researched for ownership of property by Ismael Sanchez in Conroe Texas and transfer of same. Reviewed for transactions and correspondences in CryptoFX files.	3.20 276.00/hr	883.20
2/7/2023	SSA	Reviewed for additional information regarding Ismael Sanchez and purchase of property.	0.40 276.00/hr	110.40
	DAB	Reviewed Relativity for information regarding money order and cashier check transactions. Researched correspondence regarding PLS information.	1.10 170.00/hr	187.00
2/8/2023	SSA	Reviewed and responded to email from Kierra Powell regarding 2493 Tidmor Lane property.	0.30 276.00/hr	82.80
	DAB	Researched Relativity for money order purchase and distribution information.	0.60 170.00/hr	102.00
2/10/2023	DAB	Reviewed emails from Kierra Powell and Sonila Themeli regarding money order law and reference to money order regulations. Researched same. Discussed issues with Greg Hays regarding recovery and review of money order correspondence.	1.40 170.00/hr	238.00
	SSA	Reviewed for identifying information relating to purchase of Knollwood property.	0.70 276.00/hr	193.20
2/14/2023	SSA	Traced funds used to purchase real properties and funds transferred to related entities for expansion of receivership. Researched for supporting documents for same.	2.60 276.00/hr	717.60
	DAB	Discussed issues with Greg Hays regarding research of PLS information. Continued to review Relativity and compare financial documents.	0.80 170.00/hr	136.00
2/16/2023	DAB	Reviewed for PLS data in Relativity.	0.60 170.00/hr	102.00
2/20/2023	SGH	Reviewed issues and drafted email to Caroline Gieser regarding PLS and research we had done.	0.40 362.00/hr	144.80
	DAB	Discussed issues with Greg Hays regarding research and discovery of PLS money laundering issue. Reviewed Relativity and SalesForce data for information.	0.70 170.00/hr	119.00
2/21/2023	SSA	Reviewed and researched for information relating to purchase of Knollwood property, source of funds for same and supporting documents for addition of Aspire Living to receivership.	2.60 276.00/hr	717.60
2/23/2023	SSA	Finalized researched regarding purchase of real properties. Compiled documents regarding same. Drafted emails regarding findings. Telephone call from Sonila Themeli regarding same.	5.10 276.00/hr	1,407.60
2/27/2023	DAB	Continued to research PLS information in Salesforce data.	0.90 170.00/hr	153.00
2/28/2023	SSA	Reviewed documents provided by Providence Title. Drafted email with findings.	2.10 276.00/hr	579.60
	DAB	Reviewed Salesforce data for money order and cashier check transactions. Reviewed PLS information and researched business computer purchases. Reviewed computer inventory database and researched in Relativity.	0.80 170.00/hr	136.00
	SSA	Researched for and drafted email to Kierra Powell regarding 28 Marshall purchase and current value.	0.40 276.00/hr	110.40
3/1/2023	DAB	Reviewed Relativity for Crypto FX transactions. Researched Binance and Metedex searches for identification of transfers. Drafted email to and reviewed from Greg Hays regarding same.	1.30 170.00/hr	221.00
3/2/2023	SSA	Reviewed and traced investor funds used to purchase the Polaris property.	5.30 276.00/hr	1,462.80

			<u>Hrs/Rate</u>	<u>Amount</u>
3/21/2023	DAB	Relativity research. Reviewed keyword search of PLS and Metadex. Reviewed information and spreadsheet with information containing transaction detail and daily sales.	1.80 170.00/hr	306.00
3/29/2023	SSA	Reviewed documents produced by Styers relating to purchase of property and relationship with CBT. Drafted notes on same.	1.20 276.00/hr	331.20
3/31/2023	SSA	Compiled data relating to Luxury Real Estate receipts from investors and purchase of real property.	1.80 276.00/hr	496.80
		Subtotal	58.50	15,355.20

Asset Disposition

1/13/2023	SSA	Drafted email to the Receiver regarding sale of crypto currencies and method for same.	0.20 276.00/hr	55.20
1/16/2023	SSA	Drafted email to the Receiver regarding opening trading account for transfer and liquidation of coins.	0.30 276.00/hr	82.80
1/23/2023	SGH	Reviewed emails regarding real estate appraiser and issue regarding sale of properties. Research regarding same.	0.70 362.00/hr	253.40
2/10/2023	SSA	Telephone call from Radames Darby regarding setting up crypto wallet for the Receiver. Drafted email to Blocktrace regarding same.	0.30 276.00/hr	82.80
2/16/2023	SSA	Drafted email to the Receiver regarding liquidation of Nano Ledger.	0.20 276.00/hr	55.20
3/29/2023	SSA	Reviewed and responded to email from the Receiver regarding liquidation of crypto currencies transferred to Coinbase. Drafted letter to Coinbase with instruction for liquidation of holdings. Drafted wire instructions for proceeds.	0.70 276.00/hr	193.20
		Subtotal	2.40	722.60

Business Analysis

1/3/2023	DAB	Discussed issues with Greg Hays regarding leader research, update of mailing addresses, and draft of leader database schedule. Continued to update leader detail and noted specific transactions.	0.70 170.00/hr	119.00
1/4/2023	DAB	Researched Relativity for leader information. Reviewed emails and leader lists via Relativity search. Verified social security and addresses via scanned documents. Indexed documents as reference.	1.70 170.00/hr	289.00
1/5/2023	DAB	Continued to research specific leader bonus structure documents and information regarding designated leader states. Updated leader analysis with detail.	1.40 170.00/hr	238.00
1/6/2023	DAB	Reviewed Relativity portal and researched leader and employee identification documents for distribution of sponsor letters to appropriate parties. Continued to update draft leader schedule and supporting detail. Discussed issues with Greg Hays regarding review of bonus and commission structure chart.	1.80 170.00/hr	306.00
	SSA	Prepared list of leaders from Defendant records.	0.40 276.00/hr	110.40
1/9/2023	DAB	Continued to research several leaders information via Relativity and online sources. Input address and email addresses for identified leaders. Reviewed and responded to several emails from Greg Hays and	2.40 170.00/hr	408.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		Sonila Themeli regarding verification of leader and employee information. Identified Chicago leaders and input information.		
1/10/2023	DAB	Discussed issues with Greg Hays and Scott Askue regarding recovery of leader addresses and research of same. Reviewed Relativity for emails regarding bonus and commission detail. Continued to input information into leader database. Telephone calls to and from Sonila Themeli regarding research efforts and additions to leader list.	2.40 170.00/hr	408.00
1/11/2023	DAB	Continued to input leader information into spreadsheet report. Researched for current leader addresses, phone numbers, and social security information. Telephone call from Sonila Themeli regarding additional leader list and input of new of new information. Reviewed and responded to emails from Greg Hays and Mrs. Themeli regarding same.	2.80 170.00/hr	476.00
	DAB	Continued to update leader information report in preparation of mailing to sponsors.	1.20 170.00/hr	204.00
	SGH	Review and edit the analysis of all the leaders. Discuss the new information with Dwaine Butler and updated to the leader analysis. Call from Sonila Themeli regarding sending the demand letters to the Sales Agents / Leaders.	0.80 362.00/hr	289.60
1/12/2023	SGH	Reviewed new information regarding the leaders and discussed with Dwaine Butler. Updated the leader list.	0.30 362.00/hr	108.60
	DAB	Continued to research updated contact information for sponsors. Updated chart of known sales agents. Reviewed email from Mr. Hays regarding new list of potential leaders. Reviewed current roster of leaders and compared to new document listing.	2.50 170.00/hr	425.00
1/13/2023	DAB	Continued to research missing addresses and contact information of verified leaders. Discussed issues with Greg Hays regarding specific leader detail and review of email addresses. Reviewed IdiCore for additional research efforts.	1.60 170.00/hr	272.00
1/16/2023	DAB	Updated leaders/sponsors list with current addresses from research reports. Drafted emails to and reviewed emails from Greg Hays and Sonila Themeli regarding same.	2.00 170.00/hr	340.00
1/17/2023	DAB	Reviewed email from Sonila Themeli regarding sponsor demand letter and distribution of same. Reviewed updated sponsor list and continued to research address and location of 14 verified sponsors.	1.50 170.00/hr	255.00
1/18/2023	DAB	Reviewed email from Sonila Themeli regarding draft demand letter to CFX sponsors. Reviewed letter. Reviewed current leader list for the determination of missing leader information. Continued to research idicore for specific sponsor contact information.	0.80 170.00/hr	136.00
1/20/2023	SGH	Reviewed analysis of daily activity and considered new analysis of outstanding principal for contracts in last six months.	0.50 362.00/hr	181.00
1/24/2023	SSA	Reviewed for backup and support documents relating to leader transactions.	2.40 276.00/hr	662.40
1/25/2023	SGH	Reviewed information on commissions paid to leaders and Chicago operations with no investments in BTC.	0.40 362.00/hr	144.80
	DAB	Continued to research relativity for missing sponsor contact information. Compared to updated leader list and updated two contacts with email addresses.	1.30 170.00/hr	221.00

			<u>Hrs/Rate</u>	<u>Amount</u>
1/26/2023	DAB	Reviewed and responded to emails from Sonila Themeli and Scott Askue regarding research of federal identification numbers for additional entities. Reviewed Texas Secretary of State website and idICore for business information. Discussed issues with Mr. Askue regarding Notice to entities.	0.80 170.00/hr	136.00
1/30/2023	DAB	Research and review of Relativity to locate leader and purchased IT inventory information. Discussed issues with Greg Hays regarding research efforts. Updated leader/sponsor summary.	2.20 170.00/hr	374.00
1/31/2023	DAB	Discussed issues with Greg Hays regarding status of leader research and contact information. Reviewed Status Report.	0.40 170.00/hr	68.00
2/1/2023	DAB	Continued to research Relativity for specific leader and sponsor detail. Reviewed documents for money order transactions in Relativity database.	1.60 170.00/hr	272.00
2/2/2023	SGH	Additional research regarding payment of sale agents after CFX discontinued using PLS money orders in October 2021. Reviewed Chavez deposition. Drafted email regarding same.	0.80 362.00/hr	289.60
	DAB	Continued to research correct contact information for seven remaining leaders. Reviewed and responded to email from Sonila Themeli regarding research efforts.	0.70 170.00/hr	119.00
2/3/2023	DAB	Reviewed emails from the Receiver and Greg Hays regarding potential claim against leaders. Reviewed and responded to emails from Sonila Themeli regarding update of leader addresses. Researched idICore and updated list to send demand letters.	0.30 170.00/hr	51.00
2/7/2023	DAB	Reviewed and responded to email from Sonila Themeli regarding research of ten located phone numbers. Reviewed reverse phone directory in idICore for determination of contact information to correspond with phone numbers. Continued to research contact information and addresses from the sponsor list.	1.80 170.00/hr	306.00
	DAB	Discussed issues with Greg Hays regarding research of the remaining leader addresses.	0.20 170.00/hr	34.00
2/8/2023	DAB	Reviewed and responded to email from Sonila Themeli regarding extended research of missing leader contact and address information.	0.60 170.00/hr	102.00
2/9/2023	DAB	Researched for leader address and contact information. Reviewed Relativity for Claudia Bustamantes correspondence and leader reference. Discussed issues with Greg Hays regarding conveyance of demand letters to identified leader addresses. Continued to research transaction and purchase detail from WhatsApp platform.	2.30 170.00/hr	391.00
	SSA	Researched for contract style used by California leaders still operating. Reviewed for information regarding same.	1.60 276.00/hr	441.60
2/10/2023	SSA	Reviewed contracts with California investors and leaders. Compared to Salesforce data and issues with analyzing same.	2.20 276.00/hr	607.20
2/13/2023	DAB	Reviewed and responded to email from Sonila Themeli regarding leader research. Reviewed for Juan Puac information. Reviewed Relativity for communications and reference to Mr. Puac. Updated notes with current contact information. Reviewed account reports in Kiteworks for transaction detail.	1.80 170.00/hr	306.00
2/14/2023	DAB	Researched information for remaining sale agent addresses and contact information.	1.20 170.00/hr	204.00

			<u>Hrs/Rate</u>	<u>Amount</u>
2/15/2023	SGH	Researched information on sales agents. Reviewed new documents uploaded to Kiteworks.	0.80 362.00/hr	289.60
	DAB	Reviewed email from Sonila Themeli regarding research of California sales agent information. Researched idiCore and Relativity for information for four individuals.	0.60 170.00/hr	102.00
2/16/2023	SGH	Reviewed new information on sales agents and drafted email to Sonila Themeli regarding same.	0.40 362.00/hr	144.80
	DAB	Reviewed and responded to email from Sonila Themeli regarding review of California sales agent information. Researched location detail and compared to sponsor directory spreadsheet. Discussed issues with Greg Hays regarding update of sales agent addresses. Reviewed updated mailing list.	1.80 170.00/hr	306.00
2/17/2023	DAB	Reviewed and responded to emails from Sonila Themeli regarding request for Claudia Bustamante contact and mailing information. Reviewed idiCore and researched leader address. Drafted email to Mrs. Themeli and Mia Fleming regarding information.	0.70 170.00/hr	119.00
	SSA	Researched defendant files for addresses and contact information for leaders.	0.60 276.00/hr	165.60
2/21/2023	DAB	Reviewed email from Scott Askue regarding recovery of contact information from Salesforce. Reviewed and researched several Salesforce entries for the determination of sales agent location information.	0.80 170.00/hr	136.00
2/22/2023	DAB	Researched SalesForce and PLS data for information regarding transfers and money order distributions. Continued to research Relativity for sales agent information. Reviewed missing mailing addresses and researched IdiCore and Relativity database for missing information.	1.80 170.00/hr	306.00
2/23/2023	DAB	Reviewed and responded to email from Sonila Themeli regarding Leticia Rivas and Angel Gonzalez contact and communication efforts. Reviewed idiCore for correct contact information and addresses. Discussed issues with Greg Hays regarding update of missing Illinois sales agent information. Continued to research missing documentation and contact information.	1.60 170.00/hr	272.00
3/2/2023	DAB	Reviewed Relativity for information regarding money order transfers and Metadex information. Reviewed documents for the determination of leader transactions and commission structure.	0.80 170.00/hr	136.00
3/8/2023	DAB	Reviewed leader schedule and researched for information of nine leaders. Researched idiCore and social media web sites for information.	1.20 170.00/hr	204.00
3/9/2023	DAB	Reviewed Relativity for remaining leader contact information and transaction detail. Continued to broad search of Metadex and Binance search terms for transactions	0.80 170.00/hr	136.00
3/13/2023	DAB	Leader research via Relativity. Compared prior addresses to addresses in idiCore portal. Updated contact detail.	0.80 170.00/hr	136.00
3/14/2023	DAB	Discussed issues with Scott Askue regarding leader research and identification of assets within case.	0.20 170.00/hr	34.00
3/15/2023	DAB	Researched Relativity portal for leader fee structure and transaction detail. Continued to research missing leader contact information. Identified documents for additional review.	0.80 170.00/hr	136.00

			<u>Hrs/Rate</u>	<u>Amount</u>
3/16/2023	DAB	Reviewed Relativity portal for information regarding money order purchases and leader commission structure. Continued to research additional leader information for the determination of additional investor leads.	1.60 170.00/hr	272.00
3/20/2023	DAB	Reviewed Relativity for leads related to leader transactions and flow of cash to insiders. Reviewed several spreadsheets with information regarding daily revenue and sales.	1.80 170.00/hr	306.00
3/21/2023	SSA	Reviewed documents produced by the Chicago leaders. Researched transfer of property and other issues with same.	1.80 276.00/hr	496.80
3/22/2023	DAB	Discussed issues with Scott Askue regarding research of Google Documents for information related to leader revenue. Reviewed Relativity for information on each leader. Continued review of daily sales spreadsheets for the determination of leader revenue.	1.70 170.00/hr	289.00
3/23/2023	DAB	Continued to review Relativity for information regarding leader transactions, purchase orders, and chain of revenue. Researched key words for daily gross sales.	1.80 170.00/hr	306.00
	SSA	Reviewed available leader spreadsheets produced and available in the Defendant's records. Discussed locating additional leader transaction information with Dwaine Butler.	2.20 276.00/hr	607.20
3/24/2023	DAB	Reviewed and responded to emails from Scott Askue regarding search for leader revenue spreadsheets. Reviewed Gloria Castanda "nuevos ingresos" spreadsheet and searched Relativity for other leader spreadsheets.	2.40 170.00/hr	408.00
3/27/2023	SSA	Drafted emails regarding leader tracking spreadsheets.	0.20 276.00/hr	55.20
	DAB	Continued Relativity research for leader revenue spreadsheets. Reviewed several revenue and sales charts for the determination of individual leader reports. Reviewed and searched Google Drive for specific files.	2.80 170.00/hr	476.00
3/28/2023	DAB	Continued the review in Relativity for leader spreadsheets and information regarding new revenue detail. Reviewed and responded to emails from Scott Askue regarding same.	1.80 170.00/hr	306.00
	DAB	Reviewed and responded to several emails from Sonila Themeli, Levi Percy, and Greg Hays regarding requests for company Google drive and information regarding employee folder access. Continued to research Relativity for leader information and new revenue spreadsheets for each leader. Discussed issues with Scott Askue regarding leader spreadsheet identification. Tagged documents for further review.	3.30 170.00/hr	561.00
3/29/2023	DAB	Reviewed information regarding leader revenue and sale charts for the determination of new revenue. Reviewed Relativity and researched spreadsheet for the determination of individual leader spreadsheets.	1.80 170.00/hr	306.00
	DAB	Continued Relativity review and research for leader information and revenue reports.	0.70 170.00/hr	119.00
3/30/2023	SSA	Reviewed for additional data on leader transactions and corresponding investor data.	2.20 276.00/hr	607.20
	DAB	Continued research of leader spreadsheets and new revenue documentation.	0.60 170.00/hr	102.00
3/31/2023	SSA	Drafted email to Greg Hays regarding leader data and additional required information.	0.30 276.00/hr	82.80

			<u>Hrs/Rate</u>	<u>Amount</u>
		Subtotal	88.10	17,218.40
<u>Business Operations</u>				
1/6/2023	SGH	Reviewed information regarding the Chicago leaders and on-going fraud in that market. Drafted email to Dwaine Butler regarding same and updated the leaders schedule.	0.40 362.00/hr	144.80
2/3/2023	SGH	Reviewed email regarding Ring Central phone numbers and on-going fraud. Reviewed communications to investors.	0.40 362.00/hr	144.80
	SSA	Reviewed and responded to email from the Receiver regarding continuing operations of the Defendants.	0.30 276.00/hr	82.80
	SSA	Reviewed for contact information for telephone service in Defendant records. Drafted email to Valerie Hays regarding same.	0.40 276.00/hr	110.40
		Subtotal	1.50	482.80
<u>Case Administration</u>				
1/3/2023	SSA	Receiver team meeting regarding various case matters and recoveries.	1.40 276.00/hr	386.40
	SGH	Participated in the weekly Receiver team conference call to discuss plans for the week and pending matters including action against sales agents, motion to expand receivership and other issues.	1.40 362.00/hr	506.80
	SGH	Reviewed issues regarding the Receiver's web site and drafted email to Lisa Fern regarding updates to the website to keep investor informed.	0.40 362.00/hr	144.80
	SGH	Organized documents from recent filings and prepared project list of issue to research.	1.20 362.00/hr	434.40
1/6/2023	SGH	Reviewed updated files in Kiteworks that included recording from calls from investors. Drafted email to Sonila Themeli regarding the call from the police department in Illinois. Corresponded with Sonila Themeli regarding updated message to investor and directing them to the website.	0.80 362.00/hr	289.60
	SGH	Corresponded with Lisa Fern regarding updates to Receiver's web site.	0.30 362.00/hr	108.60
1/13/2023	SSA	Reviewed and responded email from the Receiver and Sonila Themeli regarding requests from Mr. Chavez and websites update.	0.30 276.00/hr	82.80
1/17/2023	SGH	Participated in the weekly Receiver Team Zoom conference call. Discussed issues including recovery from sales agents, motion to expand receivership, asset sales, website updates, Salesforce data, document depository, discovery, Ponzi report.	1.40 362.00/hr	506.80
	SGH	Reviewed and edited the Receiver's Plan of Liquidation. Email regarding same.	0.50 362.00/hr	181.00
	SSA	Telephone conference with Receiver Team regarding sales agents claims, motion to expand receivership, asset sales, Salesforce data and other issues.	1.40 276.00/hr	386.40
1/19/2023	SGH	Reviewed and made recommendations for updates to website. Corresponded with Lisa Fern.	0.30 362.00/hr	108.60
	SGH	Reviewed and responded to emails on wide variety of issues including recovery of cars, sale of real estate, sales agents, on-going fraud in Chicago, subpoenas, and other matters.	1.30 362.00/hr	470.60

			Hrs/Rate	Amount
1/19/2023	SSA	Reviewed and responded to email from Sonila Themeli regarding information for liquidation plan.	0.30 276.00/hr	82.80
1/20/2023	SGH	Reviewed docket activity and Plan filed. Reviewed issues regarding website. Drafted email regarding claims on website.	0.40 362.00/hr	144.80
1/23/2023	SGH	Weekly conference call with Sonila Themeli, Scott Askue, and Kierra Powell regarding pending matters including: next report due 1/30/23, Salesforce, sale of real property, liquidation of BTC, report form Blocktrace, recovery from sales agents, recovery of computer, etc.	1.20 362.00/hr	434.40
	SGH	Reviewed email regarding invoice from Frank Sodetz for Chicago work and email to Sonila Themeli regarding payment of invoice.	0.20 362.00/hr	72.40
	SSA	Weekly conference call with receiver team regarding pending matters.	1.20 276.00/hr	331.20
1/24/2023	SGH	Reviewed issues regarding information on website and email to update the website for investor communications. Tested new additions to website.	0.30 362.00/hr	108.60
	SGH	Reviewed and responded to wide variety of emails on asset sale, news, Chavez money request, and other issues. Research issues regarding objection to Defendant's fund request. Corresponded with Receiver and Sonila Themeli regarding same.	0.70 362.00/hr	253.40
	SSA	Reviewed blog posts relating to investor issues. Drafted email to the Receiver regarding same.	0.30 276.00/hr	82.80
1/25/2023	SGH	Reviewed and responded to emails. Sent email to update the website.	0.40 362.00/hr	144.80
	SGH	Researched issues regarding the use of investor funds to pay Chavez's legal fees. Researched prior cases and for information regarding objections to use investors funds to pay Defendant's legal fees.	0.80 362.00/hr	289.60
1/26/2023	SGH	Researched and drafted email to Receiver and Sonila Themeli regarding Defendant's use of investor funds to pay legal fees. Reviewed pleadings in several case and picked highlights to send to Sonila Themeli for response to Flack's request for legal fees.	1.20 362.00/hr	434.40
1/27/2023	SGH	Reviewed and responded to emails from Sonila Themeli and the Receiver regarding wide variety of issues.	0.80 362.00/hr	289.60
	SGH	Researched information regarding Motion to Expand the Receivership to include asset and sales agents. Sent several emails to Sonila Themeli regarding the Motion to Expand the Receivership.	0.80 362.00/hr	289.60
	SGH	Reviewed filed motion and downloaded for posting to the Receiver's website.	0.20 362.00/hr	72.40
1/30/2023	SSA	Weekly team meeting with Receiver and Receiver Team regarding case matters, recoveries, depositions and upcoming issues.	1.20 276.00/hr	331.20
	SGH	Participated in the weekly receiver team conference call. Discussed issues regarding Blocktrace crypto trading report, sale of assets, motion to expand receivership, First Quarterly report and many other issues for this week.	1.20 362.00/hr	434.40
1/31/2023	SGH	Drafted email to Frank Soetz in Chicago. Drafted emails to Blocktrace representatives. Followed-up on pending matters.	0.40 362.00/hr	144.80
2/3/2023	SGH	Reviewed and edited letter regarding legal fees and Chavez expenses. Corresponded with counsel regarding same.	0.30 362.00/hr	108.60

			Hrs/Rate	Amount
2/3/2023	SSA	Reviewed and verified content of letter to judge regarding attorney fees.	0.30 276.00/hr	82.80
2/6/2023	SGH	Participated in the weekly receiver team conference call and discussed pending matters and plans for the week.	1.40 362.00/hr	506.80
2/9/2023	SGH	Reviewed and responded to email on wide variety of issues after being out of the office for a week.	1.50 362.00/hr	543.00
	SGH	Participated in Zoom call with investors in Los Angeles.	1.20 362.00/hr	434.40
2/13/2023	SSA	Weekly strategy regarding conference call with Receiver and receiver team.	1.80 276.00/hr	496.80
	SGH	Discussion with Scott Askue regarding the Receiver team conference call and pending matters.	0.20 362.00/hr	72.40
2/14/2023	SGH	Review and draft email to Sonila Themeli regarding motion to expand receivership.	0.40 362.00/hr	144.80
2/16/2023	SGH	Telephone call from the Receiver regarding pending matters and administrative issues.	0.30 362.00/hr	108.60
	SGH	Researched issues regarding reappointment of Receiver under Section 724 and drafted email to Sonila Themeli regarding same.	0.40 362.00/hr	144.80
2/17/2023	SGH	Researched issues regarding the fee cap in other SEC cases and email to Receiver and Sonila Themeli regarding the 60 day fee cap and implied waiver.	0.60 362.00/hr	217.20
2/20/2023	SGH	Participated in the weekly Receiver Team Zoom call to discuss pending duties and assignment. Discussed PLS complain, Salesforce data, Ponzi Expert report, sale agents, etc.	1.00 362.00/hr	362.00
	SGH	Reviewed email and issues regarding research requested by the Receiver of the on-going fraud.	0.20 362.00/hr	72.40
	SSA	Video conference with Receiver and Receiver team regarding action items and status of pending matters.	1.00 276.00/hr	276.00
2/24/2023	SGH	Reviewed receiver procedures motion and drafted email to Sonila Themeli and Receiver regarding the procedures motion to simplify certain filing issues.	0.40 362.00/hr	144.80
2/27/2023	SSA	Telephone conference with Receiver Team regarding case strategy and upcoming matters.	1.10 276.00/hr	303.60
	SGH	Participated in the weekly conference call on issues to be pursued this week. Discusses all pending matters and possible litigation and research.	1.10 362.00/hr	398.20
3/6/2023	SSA	Receiver team meeting about potential litigation and other case matters.	1.10 276.00/hr	303.60
	DAB	Discussed issues with Greg Hays regarding current case issues, research of Metadex transactions, and Relativity research. Weekly status call with John Lewis and Scott Askue.	0.80 170.00/hr	136.00
3/13/2023	SSA	Weekly team meeting with Receiver and team.	0.30 276.00/hr	82.80
	SSA	Updated Motion to invest receivership funds with information regarding recoveries to date. Updated Receiver's recovery report with same.	0.60 276.00/hr	165.60
3/20/2023	SGH	Participated in the weekly Receiver Team conference call. Reviewed pending matters.	1.50 362.00/hr	543.00
	SSA	Weekly meeting with receiver and team.	1.50 276.00/hr	414.00
3/21/2023	SGH	Reviewed draft of response to Flack's fees and email regarding same.	0.30 362.00/hr	108.60
3/27/2023	SGH	Participated in the weekly receiver team call.	0.50 362.00/hr	181.00
	SSA	Weekly team meeting with Receiver and team.	0.50 276.00/hr	138.00

			<u>Hrs/Rate</u>	<u>Amount</u>
3/29/2023	SSA	Researched for personal identification for Mauricio Chavez. Drafted email to Kierra Powell regarding same.	0.20 276.00/hr	55.20
		Subtotal	42.80	14,093.00

Claims Administration & Objections

1/19/2023	SGH	Reviewed issues for claims administration process and made recommendations regarding use of the website and data when we receive from Salesforce.	0.40 362.00/hr	144.80
2/17/2023	SGH	Reviewed the chart of sales agents and letter to the sales agents. Discussed the Salesforce database with Scott Askue and plans to use the data to establish a claims process.	0.70 362.00/hr	253.40
		Subtotal	1.10	398.20

Data Analysis

1/3/2023	SSA	Reviewed additional documents produced by Rapp and Krock.	1.60 276.00/hr	441.60
	SSA	Reviewed and responded to email from Sonila Themeli regarding review and download of data from employee and leader accounts.	0.20 276.00/hr	55.20
1/5/2023	SSA	Reviewed documents produced by Janette Gonzalez.	1.60 276.00/hr	441.60
1/12/2023	SGH	Reviewed emails from Receiver Team regarding new documents produced in Kiteworks, Salesforce data, and other matters.	0.40 362.00/hr	144.80
	SSA	Telephone call with SalesForce regarding access to data. Drafted email regarding same.	0.50 276.00/hr	138.00
1/19/2023	DAB	Researched Relativity for information on Chavez' Apple Mini-Mac computer.	1.30 170.00/hr	221.00
1/20/2023	DAB	Reviewed and researched purchased computer inventory list and verified. Drafted updated list of computers for the determination of company purchased IT equipment and Apple Mini Mac computer purchase.	0.80 170.00/hr	136.00
1/23/2023	SSA	Reviewed investor report from Gloria Castaneda. Drafted email to Sonila Themeli regarding initial comments.	1.10 276.00/hr	303.60
1/24/2023	DAB	Reviewed Relativity and researched information technology inventory purchases. Reviewed several invoice and receipts for the determination of company owned devices. Continued to review documentation and WhatsApp communications from Relativity database.	1.20 170.00/hr	204.00
	SSA	Reviewed and replied to email from Sonila Themeli regarding review of Salesforce data.	0.20 276.00/hr	55.20
1/25/2023	SSA	Reviewed leader data provided by Gloria Castaneda. Prepared analysis of same and summary of distribution of funds received.	2.90 276.00/hr	800.40
1/26/2023	DAB	Continued to research Relativity database for company purchased computers. Updated schedule of computers and drafted inventory summary to Greg Hays and Scott Askue. Verified purchase of six additional business computers and continued researched of Chavez Apple Mac Mini computer. Researched Relativity for Adam Security invoices and	2.80 170.00/hr	476.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		documentation. Printed invoices and drafted email to Receiver's counsel regarding potential contact information.		
1/27/2023	SGH	Reviewed new documents produced in Kiteworks.	0.90 362.00/hr	325.80
2/1/2023	SSA	Reviewed and provided initial comments on leader report provided by Elizabeth Escoto.	0.30 276.00/hr	82.80
	SSA	Reviewed documents provided by PRWCSWTX and drafted mails regarding tracing of crypto payments and analysis of same. Reviewed defendants' records regarding same.	2.20 276.00/hr	607.20
2/2/2023	SSA	Reviewed report provided by Roberto Zavala and drafted comments on findings.	1.50 276.00/hr	414.00
2/3/2023	SSA	Formatted Salesforce extracted data for further analysis. Studied various reports for recreation of data in additional format.	4.50 276.00/hr	1,242.00
2/6/2023	DAB	Reviewed and responded to email from Sonila Themeli regarding research of RingCentral phone numbers for identification of additional insiders. Reviewed idicore reverse phone directory for information. Reviewed Relativity for data consisting of RingCentral phone numbers.	2.40 170.00/hr	408.00
	SSA	Reviewed and emailed Sonila Themeli and Arlen Tanner regarding Salesforce data and processing of same.	0.40 276.00/hr	110.40
2/7/2023	SSA	Set up and accessed Salesforce account. Reviewed available data. Prepared report of investor data. Video Conference with Levi Percy, Arlen Tanner and Sonila Themeli regarding extraction of data, creation of database and other issues with the data.	3.40 276.00/hr	938.40
2/15/2023	SSA	Reviewed and prepared reports from Salesforce. Compared report results to paper statements and leader documents. Exported data and compared to extracted .csv data.	4.30 276.00/hr	1,186.80
2/16/2023	SSA	Designed and prepared reports of investor earnings, bonus and commission reports in Salesforce by year. Tested data for completeness against paper investment contracts and spreadsheets. Drafted email to Arlen Tanner regarding same. Compared individual investor	5.30 276.00/hr	1,462.80
2/17/2023	SGH	Reviewed new documents uploaded in Kiteworks.	0.60 362.00/hr	217.20
	SSA	Drafted emails to and reviewed emails from Arlen Tanner regarding restrictions in Salesforce access. Formatted and combined exported Salesforce csv raw data for creation of database.	3.80 276.00/hr	1,048.80
2/21/2023	SGH	Reviewed data of 35,000 investors from Salesforce. Discussed issues in the data with Scott Askue. Reviewed email regarding the Illinois data for production	0.50 362.00/hr	181.00
2/27/2023	SSA	Reviewed productions from JP Morgan, Bank of America and others. Prepared notes and documents of interest.	1.30 276.00/hr	358.80
3/2/2023	SSA	Drafted email to and reviewed emails from Sonila Themeli regarding SalesForce data and use of same. Reviewed issues and testing of same.	0.40 276.00/hr	110.40
3/7/2023	SSA	Drafted email to Sonila Themeli regarding review of Salesforce data.	0.30 276.00/hr	82.80
3/10/2023	SSA	Downloaded, restore and reviewed reports from Salesforce.	1.20 276.00/hr	331.20

			<u>Hrs/Rate</u>	<u>Amount</u>
3/21/2023	SGH	Reviewed new documents posted in Kiteworks and check for Benvenuto. Drafted email to Scott Askue and Sonila Themeli regarding \$230,000 checks from Ebenezer Construction. Reviewed other documents produced from sales agents and uploaded to Kiteworks.	1.10 362.00/hr	398.20
		Continued to review new documents posted in Kiteworks.	0.60 362.00/hr	217.20
3/28/2023	SGH	Reviewed new data uploaded in Kiteworks.	0.70 362.00/hr	253.40
		SSA Reviewed production from Netspend. Researched issues raised by production. Drafted email regarding same.	0.60 276.00/hr	165.60
3/30/2023	SGH	Reviewed the Google files that were uploaded to Relativity for information on sales leaders and BTC.	0.90 362.00/hr	325.80
		SGH Reviewed additional Google files and sent email to Sonila Themeli regarding the passwords for the email accounts.	1.10 362.00/hr	398.20
3/31/2023	SGH	Reviewed documents uploaded to Kiteworks. Email regarding Zelle payments.	0.70 362.00/hr	253.40
		SGH Continued to reviewed documents from the Google Drive. Corresponded with Sonila Themeli and Levi Percy and Scott Askue regarding issues on the data and the "takedown drive." Emailed regarding the fact that there is a main drive and we do not have access to all of records we need for leaders and sales agents.	2.50 362.00/hr	905.00
4/1/2023	DAB	DAB Reviewed and responded to several emails from Greg Hays, Levi Percy, Sonila Themeli and Scott Askue regarding access to Google Drive, specific downloads, and research in Relativity for information regarding investor Bitcoin transactions. Continued to research Relativity to identify transactions, investor detail, and leader Bitcoin accounts.	2.40 170.00/hr	408.00
		SSA Reviewed leader findings and drafted email to the Receiver and Sonila Themeli regarding available leader information transaction information and need to additional information on the CryptoFX Google drive.	0.60 276.00/hr	165.60
		SSA Reviewed and responded to emails from Arlen Tanner and Sonila Themeli regarding continued use of Salesforce.	0.20 276.00/hr	55.20
		Subtotal	59.30	16,071.40

Employee Benefits / Pensions

1/12/2023	SSA	Compiled employee contact and other informational data. Drafted email to Sonila Themeli regarding same.	1.40 276.00/hr	386.40
	DAB	Reviewed and responded to emails from Sonila Themeli and Greg Hays regarding research for security guard (Adam) information. Researched idICore for relative information.	0.30 170.00/hr	51.00
1/19/2023	DAB	Reviewed Generad Serrano information for Adam in security contact information. Researched idICore and Relativity for addition multiple references.	0.50 170.00/hr	85.00
1/25/2023	DAB	Researched Relativity for information regarding Adam in security and payments to security professionals. Researched security company information for Adam contact information.	0.40 170.00/hr	68.00

			<u>Hrs/Rate</u>	<u>Amount</u>
1/27/2023	SGH	Reviewed email from Dwaine Butler regarding his research regarding Chavez security team. Researched information regarding the security teams and searched for last names of Adam and Joseph as we need to identify and interview.	0.60 362.00/hr	217.20
	DAB	Continued Relativity and IdiCore research for Adam Security contact information. Reviewed several IdiCore searches for Adan and Adam Garcia. Reviewed provided phone number and researched via phone information. Reviewed investor list and call detail report for information.	1.20 170.00/hr	204.00
2/1/2023	DAB	Reviewed and responded to emails from Sonila Themeli and Scott Askue regarding discovery of Adam Security information.	0.20 170.00/hr	34.00
	DAB	Reviewed and responded to email from Greg Hays regarding additional information on employee phone numbers. Reviewed database and compared to current list.	0.30 170.00/hr	51.00
2/7/2023	DAB	Researched IdiCore for Adan Security personnel contact information.	0.20 170.00/hr	34.00
2/8/2023	DAB	Continued to review emails from Relativity and documentation of employee W-2 forms for determination of addresses.	0.60 170.00/hr	102.00
		Subtotal	5.70	1,232.60

Fee / Employment Applications & Objection

1/3/2023	SGH	Reviewed issues for the upcoming fee application and researched recent fee application in SEC cases in Texas. Drafted an email to Receiver and Sonila Themeli regarding a fee application in Arise Bank Texas case and sample fee application. Began reviewing time entries for HFC fee application.	0.80 362.00/hr	NO CHARGE
1/9/2023	SSA	Reviewed and edited fee invoice for upcoming fee application.	1.20 276.00/hr	NO CHARGE
1/10/2023	SGH	Edited time for fee application.	1.00 362.00/hr	NO CHARGE
1/11/2023	SGH	Reviewed and edited time and coded all time entries for consistency for the fee application.	2.00 362.00/hr	NO CHARGE
1/12/2023	SGH	Reviewed issues for the fee application and drafted an email to Receiver and Sonila Themeli recommending certain issues to include in the fee application including references to: First Interim Report and Motion for Contempt. Recommended Bios be included and the graphs of the total amount of fraud of and post TRO activity.	0.60 362.00/hr	NO CHARGE
	SSA	Worked on fee application issues.	0.80 276.00/hr	NO CHARGE
1/13/2023	SGH	Prepared Exhibits for fee applications.	0.70 362.00/hr	NO CHARGE
1/17/2023	SGH	Reviewed draft of the Receiver's First Fee Application and provided edits and comments regarding the work accomplished during the fee application period.	0.50 362.00/hr	NO CHARGE
	SGH	Researched information to included in the fee application and drafted language regarding the Johnson factors.	0.40 362.00/hr	NO CHARGE
1/19/2023	SGH	Reviewed receiver efforts and drafted issues for use in fee application.	0.40 362.00/hr	NO CHARGE

			<u>Hrs/Rate</u>	<u>Amount</u>
1/24/2023	SGH	Reviewed draft of the fee application and provided comments.	0.30 362.00/hr	NO CHARGE
	SSA	Reviewed fee application.	0.50 276.00/hr	NO CHARGE
2/21/2023	SGH	Reviewed and edited fee order. Drafted email to Receiver and Sonila Themeli regarding draft of order and issues for concern. Researched additional language regarding fee cap imposed by SEC for 60 days on this estimated \$400 million Ponzi scheme.	1.20 362.00/hr	NO CHARGE
	SGH	Additional review and analysis of total fees for the fee application. Calculated blended hourly rate for Receiver Team for fee application and drafted email regarding same. Verified figures. Drafted email to Sonila Themeli and Receiver. Additional analysis regarding the fee cap and holdback.	1.90 362.00/hr	NO CHARGE
2/22/2023	SGH	Review and analysis in connection with the first fee application. Updated analysis of fee. Call to Sonila Themeli regarding the fee application. Edited the drafts of the application and order regarding the 60 Day fee cap and holdback issues.	1.20 362.00/hr	NO CHARGE
2/23/2023	DAB	Reviewed Receiver's Interim Fee Application. Discussed issue with Greg Hays regarding preparation of second fee application.	0.40 170.00/hr	NO CHARGE
3/20/2023	DAB	Reviewed idicore invoice and confirmed billing to include in Fee Application.	0.20 170.00/hr	NO CHARGE
		Subtotal	14.10	0.00

Forensic Accounting

1/5/2023	SGH	Conference call with James Daniels, Kevin Duberstein of Blocktrace and Scott Askue. Discussed plans for forensic accounting analysis of the Coinbase data and tracing the crypto currencies purchased.	0.80 362.00/hr	289.60
	SGH	Reviewed crypto search terms. Researched information in Relativity on the search terms provided by BlockTrace. Corresponded with Levy Percy regarding the search terms and set up search. Reviewed data regarding National Bitcoin ATM and drafted email regarding same. Continued to research data of various crypto currencies to locate the data to trace the funds. Uploaded documents to a Box share file secure account to share with James Daniels and Kevin Duberstein.	3.50 362.00/hr	1,267.00
	SSA	Telephone call to with James Daniel and Kevin Duberstein of Blocktrace regarding review of crypto transactions. Drafted email to Sonila Themeli regarding engagement of same. Reviewed for available crypto records.	1.50 276.00/hr	414.00
1/6/2023	SGH	Updated document to the BOX share filed for BlockTrace to investigate the crypto transactions. Reviewed document provided by SEC and others and posted to the website. Drafted email to Scott Askue regarding index to SEC production. Continued to review crypto documents and researched Relativity.	2.50 362.00/hr	905.00
	SSA	Drafted emails to Blocktrace and responded to email from same regarding issues for engagement. Edited and commented on engagement agreement.	0.50 276.00/hr	138.00

			<u>Hrs/Rate</u>	<u>Amount</u>
1/9/2023	SGH	Reviewed new information uploaded for any crypto data. Corresponded with Crypto investigators at BlockTrace.	5.00 362.00/hr	1,810.00
1/12/2023	SSA	Gathered data relating to additional crypto transactions and updated for review. Drafted email to James Daniel and Kevin Duberstein regarding same.	0.70 276.00/hr	193.20
1/17/2023	SGH	Conference call with James Daniels, Kevin Duberstein, and Scott Askue crypto currency issues and liquidation of account and trading profits from the Coinbase account. Drafted email to James Daniels and Kevin Duberstein regarding crypto matters and reported profits.	0.60 362.00/hr	217.20
	SSA	Conference call with James Daniels, Kevin Duberstein of BlockTrace and Greg Hays regarding analysis of accounts and other crypto issues.	0.50 276.00/hr	138.00
1/20/2023	SGH	Researching issues regarding cryptocurrency trading.	0.60 362.00/hr	217.20
	DAB	Reviewed report from Blocktrace on Crypto tracing. Searched Relativity for two wallets mentioned. Drafted email to James Daniels, Kevin Duberstein and Scott Askue regarding same.	0.60 170.00/hr	102.00
1/23/2023	SGH	Review and analysis in response to James Daniels email regarding Coinbase. Drafted several email to James Daniels.	0.90 362.00/hr	325.80
1/24/2023	SSA	Analyzed issues relating to value of Julio Taffinder's wallet as of 12/31/22.	0.40 276.00/hr	110.40
1/30/2023	SSA	Performed initial review of BlockTrace analysis of crypto trading by CryptoFX.	0.70 276.00/hr	193.20
1/31/2023	SSA	Completed review of report prepared by Blocktrace. Drafted email to same regarding various issues.	1.10 276.00/hr	303.60
2/2/2023	SGH	Microsoft Teams conference with Kevin Duberstein and Scott Askue regarding Binance and SquareUp crypto wallets. Email to Sonila Themeli regarding same.	0.50 362.00/hr	181.00
	SSA	Conference call with Blocktrace regarding crypto transactions.	0.30 276.00/hr	82.80
2/10/2023	SGH	Reviewed and responded to emails regarding crypto transaction with Kevin Duberstein and Scott Askue (.4). Emails to Sonila Themeli regarding crypto and other pending matters (.3).	0.70 362.00/hr	253.40
2/15/2023	SSA	Drafted email to Kevin Duberstein regarding Binance transactions.	0.20 276.00/hr	55.20
2/22/2023	SSA	Drafted email to Kevin Duberstein of Blocktrace regarding transfer to Nano Ledger and access to same.	0.30 276.00/hr	82.80
2/24/2023	SGH	Reviewed information regarding Binance, Metadex and Safe Pal. Corresponded with Kevin Duberstein regarding same and funds from Coinbase to Binance.	0.60 362.00/hr	217.20
	DAB	Researched Binance, Metadex, and SafePal for the determination of additional assets and transactions. Reviewed and responded to emails from Greg Hays regarding same.	1.20 170.00/hr	204.00
	SSA	Reviewed and uploaded data to shared drive and drafted email to Blocktrace regarding Binance response.	0.50 276.00/hr	138.00
2/27/2023	SSA	Reviewed for crypto transactions with Gustavo Gomez. Drafted email to BlockTrace regarding same.	0.60 276.00/hr	165.60
	DAB	Reviewed email from Greg Hays regarding Binance and Metadex transaction research. Reviewed Relativity for information regarding tracking of payments via SafePal and Binance.	0.90 170.00/hr	153.00

			<u>Hrs/Rate</u>	<u>Amount</u>
3/6/2023	SSA	Uploaded files for research of crypto transactions with Gustavo Gomez. Drafted email to Blocktrace regarding same.	0.40 276.00/hr	110.40
3/7/2023	SSA	Researched for and compiled documents relating to accounts and backup of Crypto exchange trades.	1.90 276.00/hr	524.40
	DAB	Reviewed Relativity portal for Coinbase and Binance transactions. Researched various Metadex and Binance searches for money order transactions.	0.80 170.00/hr	136.00
3/21/2023	SSA	Researched for payments received by CBT from investors. Traced uses of funds.	1.50 276.00/hr	414.00
3/28/2023	SGH	Reviewed issues regarding crypto accounts. Corresponded with James Daniels regarding several issues and liquidating the nano account.	0.50 362.00/hr	181.00
3/30/2023	SGH	Prepared summary of BTC purchases and sent email to James Daniels and Kevin Duberstein of Blocktrace regarding the \$400K in BTC investors payments in July 2020.	1.40 362.00/hr	506.80
	DAB	Reviewed several emails from Greg Hays regarding Bitcoin earning schedule and tracking of Bitcoin transactions. Reviewed Relativity and searched for information on Bitcoin deposit activity.	2.20 170.00/hr	374.00
Subtotal			34.40	10,403.80

Litigation Consulting

1/3/2023	SGH	Researched issues regarding the Document Depository and drafted email to Receiver and Sonila Themeli regarding such an arrangement in a Arizona case.	0.40 362.00/hr	144.80
	SGH	Reviewed issues regarding claims against Sales Agents and drafted email to Sonila Themeli and Receiver.	0.50 362.00/hr	181.00
1/4/2023	SGH	Researched issues regarding claims against Sales Agent and Document Depository. Reviewed email from Sonila Themeli regarding pending matters and responded.	0.40 362.00/hr	144.80
1/5/2023	SSA	Reviewed defendant records for documents associated with Tony Lemos for interview of same.	1.50 276.00/hr	414.00
1/6/2023	SGH	Research regarding claims against Sponsors / Leaders / Sales Agents. Updated the list of sale agents prepared by Dwaine Butler. Researched additional information on sales agents in Relativity. Updated list and drafted email to Sonila Themeli and Receiver regarding mailing a demand letter to all 72 "leaders"	2.50 362.00/hr	905.00
	SSA	Continued review of defendant records for documents associated with Tony Lemos. Prepared as exhibits for interview. Prepared index and comments on same.	4.20 276.00/hr	1,159.20
1/10/2023	SGH	Emails with Sonila Themeli on plans regarding pursuing the Sales Agents.	0.30 362.00/hr	108.60
1/12/2023	SGH	Reviewed Defendant's subpoena for receivership records. Researched issues and pleading from other receiver case regarding producing documents to Defendants in electronic database. Reviewed issues regarding privacy concerns. Downloaded documents and procedures from NAFER web site. Drafted email to Receiver Team regarding issues in other receiver cases and prepared an outline of recommended	2.50 362.00/hr	905.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		objections and procedures given the tens of thousands of pages of documents as discussed in the Receiver's First Interim Report.		
1/13/2023	SGH	Updated the graphs of total sales activity of over \$300 million and the post TRO activity. Drafted email to Kierra Powell, Sonila Themeli and Receiver regarding same.	0.60 362.00/hr	217.20
1/16/2023	SGH	Drafted the Ponzi Scheme expert report. Reviewed case law and reviewed and organized document to attach to the report. Drafted language regarding the Ponzi presumption and funds in bank account at time of receiver's appointment. Reviewed complaint and Carol Hand Declaration and added information regarding the crypto trading profits of \$1.5 million and compared to total funds raised. Began organizing supporting documents. Spent all day on this matter on holiday without interruption.	6.00 362.00/hr	2,172.00
	SSA	Reviewed case documents for interview of Ana Munoz.	3.80 276.00/hr	1,048.80
1/17/2023	SGH	Reviewed issues regarding Defendants request for access to all documents and drafted email to Sonila Themeli regarding same.	0.40 362.00/hr	144.80
	SGH	Updated the draft of the Ponzi report. Added language on crypto to the Ponzi report.	0.80 362.00/hr	289.60
	SGH	Reviewed Response to Receiver's Motion to Show Cause. Considered issues to address in the Ponzi report.	0.60 362.00/hr	217.20
	SGH	Updated the Ponzi report with quotes regarding the office management from the Response to Receiver's Motion to Show Cause.	1.20 362.00/hr	434.40
	SSA	Compiled documents for interview of Ana Munoz. Drafted email to Sonila Themeli regarding same.	2.60 276.00/hr	717.60
1/18/2023	SGH	Spent the entire day working and updating the Ponzi scheme expert report reviewed the Hahn declaration and added information. Reviewed the Flack response and added information regarding the business operation.	7.00 362.00/hr	2,534.00
	SGH	Reviewed and responded to Sonila Themeli regarding Receiver's Reply Brief to the Response filed by Flack to Motion to Show Cause. Considered issues and drafted response.	0.80 362.00/hr	289.60
1/19/2023	SGH	Review and analysis of the outstanding obligations of CFX given the terms of the contract. Reviewed and discussed issues with Scott Askue. Reviewed analysis of daily investments and considered format for analysis for Ponzi report.	2.00 362.00/hr	724.00
1/26/2023	SGH	Reviewed draft of Motion to Show Cause and provided comments regarding computers CFX acquired and waiver of privilege to obtain Chavez computer.	0.80 362.00/hr	289.60
1/27/2023	SGH	Reviewed and researched additional information for response to Chavez regarding Motion to Show Cause. Provided edits regarding waiver of privilege.	0.40 362.00/hr	144.80
1/30/2023	SGH	Reviewed the BlockTrace report on crypto trading and considered issues for the Ponzi report. Drafted language for quarterly report.	0.60 362.00/hr	217.20
1/31/2023	SGH	Reviewed and consider plans to pursue the sales agents. Researched the Stanford case and the litigation against the 300 advisors that were added as Relief Defendants. Retrieved documents from the docket regarding issues in the litigation and drafted	2.50 362.00/hr	905.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		email to Receiver team regarding issues and the recoveries the case over a 10 year period. Retrieved language for use in CFX case against sales agents.		
2/2/2023	SGH	Reviewed and responded to email from Sonila Themeli regarding litigation plan.	0.40 362.00/hr	144.80
2/6/2023	SSA	Reviewed and commented on Sur-Reply in opposition to Receiver's motion to show cause.	0.50 276.00/hr	138.00
2/7/2023	SSA	Continued review of records and coding of documents for interview with former employee Cindy Mezemo.	3.30 276.00/hr	910.80
2/8/2023	SSA	Prepared for and attended interview of Cindy Mezemo. Drafted notes and questions or same.	2.50 276.00/hr	690.00
2/9/2023	SGH	Reviewed banking laws on MSA and money orders. Considered issues. Drafted email regarding referral of PLS to Texas Banking Department to determine reporting requirements.	0.60 362.00/hr	217.20
2/13/2023	SGH	Reviewed issues regarding sale agent litigation and emails regarding same.	0.40 362.00/hr	144.80
2/14/2023	SGH	Conference call with Sonila Themeli and Scott Askue regarding litigation strategy and claims against sales agents and net winners. Discussed the Zeek Rewards model for the class action for all claims and pursuing on a contingent fee.	0.50 362.00/hr	181.00
	SSA	Telephone conference with Sonila Themeli and Greg Hays regarding litigation strategy.	0.40 276.00/hr	110.40
2/20/2023	SGH	Telephone call to Sonila Themeli regarding litigation strategy and filing the Ponzi scheme expert report. Discussed issues in completing the report and using the Salesforce data and report from crypto experts to clearly show the case was a Ponzi scheme. Discussed the case law and recent decision.	0.50 362.00/hr	181.00
2/21/2023	SSA	Prepared account data from Salesforce for production to the Illinois Secretary of State's office. Drafted emails to Receiver team regarding same.	1.10 276.00/hr	303.60
	SGH	Reviewed and researched additional documents for Ponzi expert report. Reviewed issues and information regarding office procedures and cash administration. Updated sections of report and searched Relativity for documents.	2.00 362.00/hr	724.00
2/22/2023	SGH	Reviewed information regarding Gustavo Gomez and issues for interview. Reviewed Transfer Agreement and \$600,000 agreement. Drafted email to Kevin Duberstein regarding the transfer of \$500,000 in cryptos per the WhatsApp exchange before June 2021.	0.80 362.00/hr	289.60
	SGH	Researched information for the Ponzi scheme expert report.	0.60 362.00/hr	217.20
	SSA	Researched for information on Gustavo Gomez and documents supporting issues relating to same for interview.	1.30 276.00/hr	358.80
2/24/2023	SGH	Reviewed 5th circuit case law on Ponzi schemes and reviewed draft of report on Ponzi schemes and cases to add to the report.	0.50 362.00/hr	181.00
2/28/2023	SGH	Reviewed information regarding PLS claim.	0.30 362.00/hr	108.60
	SGH	Responded to email from James Daniels regarding PLS issues.	0.30 362.00/hr	108.60
3/13/2023	SSA	Researched for information relating to Quest Trust document request. Drafted email to Sonila Themeli regarding same.	0.40 276.00/hr	110.40

			<u>Hrs/Rate</u>	<u>Amount</u>
3/22/2023	SSA	Telephone call from Sonila Themeli regarding estimated investors and investments and daily cash flow as reported by CryptoFX in preparation for Show Cause hearing.	0.80 276.00/hr	220.80
3/23/2023	SSA	Reviewed and responded to Sonila Themeli's summary of show cause hearing.	0.20 276.00/hr	55.20
3/31/2023	SGH	Reviewed status of the Ponzi report and considered information to add regarding the Bitcoin payments by investors during 2022.	0.80 362.00/hr	289.60
		Subtotal	60.60	19,993.60

Status Reports

1/23/2023	SGH	Updated analysis of the chart of BTC price versus the funds raised by CFX for the upcoming report.	0.80 362.00/hr	289.60
1/24/2023	SGH	Prepared an analysis and affidavit regarding the funds raised by CFX and the price of BTC. Updated the chart of from 11/1/22 to 9/28/22. Explained the Chart in an Affidavit. Emails with Kierra Power and Sonila Themeli regarding same.	1.50 362.00/hr	543.00
1/25/2023	SGH	Updated graph and finalized the Affidavit to attach to the Second Interim Report.	0.90 362.00/hr	325.80
1/27/2023	SGH	Drafted outline for Receiver's Second Interim Report and email to Sonila Themeli.	0.40 362.00/hr	144.80
	SGH	Telephone call to Sonila Themeli regarding Second Interim Report.	0.40 362.00/hr	144.80
1/30/2023	SGH	Reviewed and edited the Quarterly Report. Researched issues to add to the report. Corresponded with Sonila Themeli regarding issues for the report.	1.50 362.00/hr	543.00
1/31/2023	SGH	Reviewed and edited second status report. Researched information for the report and added. Discussed pending issues with Scott Askue.	0.80 362.00/hr	289.60
	SSA	Reviewed and edited Receiver's Second Interim Report.	1.60 276.00/hr	441.60
	SSA	Prepared updated asset and recovery analysis for Second Interim Report.	0.60 276.00/hr	165.60
2/25/2023	SGH	Reviewed status of research by Blocktrace. Email with James Daniels regarding status of fees to date. Drafted email to receiver regarding status and fees to date. Email to James Daniels regarding report to file with Receiver's Interim Report.	0.60 362.00/hr	217.20
3/28/2023	SGH	Reviewed information for the quarterly report on BTC transactions.	0.40 362.00/hr	144.80
		Subtotal	9.50	3,249.80

Tax Issues

1/24/2023	SSA	Prepared IRS forms 8809 for Receiver's signature to extend timing to file 1099s.	1.20 276.00/hr	331.20
1/26/2023	SSA	Researched for tax id number for defendants and related entities.	1.00 276.00/hr	276.00
2/19/2023	JRJ	Prepared Federal extension for year ended 12/31/2022 for CBT Group LLC. Electronically filed extension.	0.40 276.00/hr	110.40
	JRJ	Prepared Federal extension for year ended 12/31/2022 for Crypto FX LLC. Electronically filed extension.	0.60 276.00/hr	165.60

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/21/2023	JRJ	Researched IRS e file rejects for 2022 extensions for Crypto FX and CBT Group. Researched documents to confirm single member LLC status as disregarded entities. Reviewed receiver Order. Discussed same with Scott Askue and payroll tax filings.	0.60 276.00/hr	165.60
	SSA	Telephone call from Jim Jennings regarding various tax filing requirements, data and strategy for same.	0.40 276.00/hr	110.40
	SSA	Researched for documents supporting tax treatment of CBT and CFX. Telephone call from Jim Jennings regarding same.	0.50 276.00/hr	138.00
2/27/2023	SSA	Prepared form 8809 extension for additional time to prepare 1099s.	0.30 276.00/hr	82.80
3/31/2023	SSA	Prepared letter to the IRS and Forms 8809 requesting additional time to prepare W2s and 1099s. Drafted email to the Receiver regarding same.	0.60 276.00/hr	165.60
		Subtotal		5.60 1,545.60
		For professional services rendered	391.00	\$102,809.40

EXHIBIT D

Additional Charges :

	<u>Amount</u>
<u>Expenses</u>	
1/31/2023 IDI charges January 2023	227.00
2/24/2023 Tax software licensing fee for filing of bankruptcy estate returns (CryptoFX LLC).	35.00
Tax software licensing fee for filing of bankruptcy estate returns (CBT).	35.00
3/31/2023 IdiCore research and comprehensive reports invoice #475393.	31.75
Subtotal	328.75
Total costs	\$328.75
Total amount of this bill	\$103,138.15